

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

NOTICE OF LEAD PLAINTIFFS' MOTION TO SEAL

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, hereby give Notice that they have moved this Court for entry of an Order permitting Lead Plaintiffs to file under seal their Reply Memorandum of Law and Exhibits in further support of their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

That Motion is entitled Lead Plaintiffs' Motion To Seal Reply Memorandum Of Law And Exhibits In Further Support Of Their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

DATED: November 19, 2015

/s/ Susan R. Podolsky

Susan R. Podolsky (Va. Bar No. 27891)

LAW OFFICES OF SUSAN R. PODOLSKY

1800 Diagonal Road, Suite 600

Alexandria, Virginia 22314

Telephone: (571) 366-1702

Facsimile: (703) 647-6009

spodolsky@podolskylaw.com

*Local Counsel for Lead Plaintiffs Her Majesty
the Queen in Right of Alberta and Fresno
County Employees' Retirement Association*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

David R. Stickney (admitted *pro hac vice*)

Jonathan D. Uslaner (admitted *pro hac vice*)

Brandon Marsh (admitted *pro hac vice*)

12481 High Bluff Drive, Suite 300

San Diego, California 92130

Telephone: (858) 793-0070

Facsimile: (858) 793-0323

davids@blbglaw.com

jonathanu@blbglaw.com

brandon.marsh@blbglaw.com

*Counsel for Lead Plaintiff Fresno County
Employees' Retirement Association and
Co-Lead Counsel for the Class*

**BLEICHMAR FONTI
TOUNTAS & AULD LLP**

Joseph Fonti (admitted *pro hac vice*)

Javier Bleichmar (admitted *pro hac vice*)

Wilson Meeks (admitted *pro hac vice*)

7 Times Square, 27th Floor

New York, New York 10036

Telephone: (212) 789-1340

Facsimile: (212) 205-3960

jfonti@bftalaw.com

jbleichmar@bftalaw.com

wmeeks@bftalaw.com

*Counsel for Lead Plaintiff Her Majesty the
Queen in Right of Alberta and Co-Lead
Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky
Susan R. Podolsky
Virginia Bar No. 27891
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
Phone: 571-366-1702
Fax: 703-647-6009
spodolsky@podolskylaw.com

Local Counsel for Lead Plaintiffs